

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL MASTER, LTD.;	:	
ACP MASTER, LTD.; AURELIUS	:	
OPPORTUNITIES FUND, LLC; 683	:	
CAPITAL PARTNERS, LP; ADONA LLC;	:	
EGOZ I LLC; EGOZ II LLC; MASTERGEN,	:	
LLC; ERYTHRINA, LLC; AP 2016 1, LLC;	:	
AP 2014 3A, LLC; AP 2014 2, LLC; WASO	:	
HOLDING CORPORATION; TWO SEAS	:	
GLOBAL (MASTER) FUND LP; VIRTUAL	:	
EMERALD INTERNATIONAL LTD.; and	:	Case No.: 1:23-CV-10838 (LAP)
THE BANK OF NEW YORK MELLON,	:	
solely in its capacity as Trustee,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
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**STIPULATION AND [PROPOSED] ORDER**

Plaintiffs Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund, LLC, 683 Capital Partners, LP, Adona LLC, Egoz I LLC, Egoz II LLC, Mastergen, LLC, Erythrina, LLC, AP 2016 1, LLC, AP 2014 3A, LLC, AP 2014 2, LLC, WASO Holding Corporation, Two Seas Global (Master) Fund LP, Virtual Emerald International Ltd., and The Bank of New York Mellon, solely in its capacity as Trustee (together, “Plaintiffs”), and Defendant The Republic of Argentina (the “Republic”), through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on December 13, 2023, Plaintiffs filed their complaint in this action (ECF No. 1, the “Complaint”);

WHEREAS, the Republic moved to dismiss Plaintiffs' Complaint on July 2, 2024 (ECF Nos. 22-24, the "Motion to Dismiss");

WHEREAS, pursuant to a July 12, 2024 Stipulation and Order (ECF No. 27), Plaintiffs' opposition to the Motion to Dismiss is currently due on September 17, 2024 and the Republic's reply in further support is currently due on November 5, 2024;

WHEREAS, Plaintiffs intend to seek consent or leave of Court to amend their Complaint to address matters raised by the Republic in the Motion to Dismiss; and

WHEREAS, Plaintiffs and the Republic desire to extend the remaining deadlines for the Motion to Dismiss in order to provide time for the parties to consider a possible amendment of the Complaint;

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN the undersigned counsel as follows:

1. Plaintiffs' time to file any papers in opposition to the Motion to Dismiss is extended to October 8, 2024.
2. The Republic's time to file any reply papers in further support of the Motion is extended to December 9, 2024.

Dated: September 15, 2024

/s/ Robert J. Giuffra, Jr.

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*Counsel for Plaintiffs Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunity Fund LLC, and Plaintiff The Bank of New York Mellon, solely in its capacity as Trustee*

/s/ Matthew S. Salerno

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/s/ Matthew M. Riccardi

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*Counsel for Plaintiff 683 Capital Partners, LP*

IT IS SO ORDERED, this \_\_\_\_ day of September, 2024:

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Hon. Loretta A. Preska  
United States District Judge